

# USDA Child Nutrition Programs Administrative Review Summary Report

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**School Food Authority:** Abbotsford School District

**Agency Code:** 100007

**School(s) Reviewed:** Abbotsford Jr. and Sr. High

**Review Date(s):** 1/23/17-1/25/17

**Date of Exit Conference:** 1/25/17

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State agencies (SA) are required to conduct administrative reviews to assess School Food Authority (SFA)'s administration of the National School Lunch Program (NSLP), School Breakfast Program (SBP), and other school nutrition programs. The objectives of the Administrative Reviews are to:

- Determine whether the SFA meets program regulations,
- Provide technical assistance,
- Secure needed corrective action,
- Assess fiscal action, and when applicable, recover improperly paid funds.

## **General Program Reminders/Updates:**

- The Department of Public Instruction (DPI) School Nutrition Team (SNT) conducts School Nutrition Skills Development Courses (SNSDC) each summer in various locations around the state at no charge. Courses cover many areas of the school nutrition programs including administrative responsibilities, program basics, meal pattern requirements and menu planning, financial management, professional standards, procurement, and many other topics. More information along with other upcoming trainings and webinars can be found on the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training](http://dpi.wi.gov/school-nutrition/training).
- SFA staff are encouraged to pursue GOALS Certification. GOALS stands for Goal Oriented Achievement Learning Skills. This is a certificate endorsed by the DPI and is obtained by completing training in nutrition, program administration and operations, and communications and marketing. For more information go to the Wisconsin DPI School Nutrition Training webpage [dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills](http://dpi.wi.gov/school-nutrition/training/goal-oriented-achievement-learning-skills).

## **Appreciation/Commendations/Noteworthy Initiatives:**

Thank you to the staff at Abbotsford School District for the courtesies extended to us during the on-site review. Staff were available to answer questions and were receptive to recommendations and guidance. Thank you for taking the time to respond to the off-site questions and requests, as well as pulling records for the on-site portion of the review.

Of utmost importance, we would like to highlight that Abbotsford School district is running an exceptional program. Staff are committed to serving their students and the program is meeting the core mission, to fight hunger and obesity while providing healthy meals to children. The director makes an effort to incorporate culinary flair and expose students to less familiar produce. These practices are surely contributing to the high participation rates at lunch. Abbotsford's school meals rock!

## REVIEW AREAS

### 1. MEAL ACCESS AND REIMBURSEMENT

#### Commendations

- The Determining Official has attended DPI trainings and is proficient in applying the regulations to the free and reduced meal application and verification tasks. She does a great job!
- The district has a need for program communications to be made available in Spanish, which the district provides along with in-person translation services. These services significantly reduce language barriers and ensure meal access to those who qualify.
- Applications are reviewed in a timely manner. Eligibility determination are made, the family notified of its status, and the status implemented well within 10 operating days of the receipt of the application.
- Thank you for running Direct Certification matches in the required time frames and more often when you receive a new student or to pick up any newly eligible students.

#### Comments/Technical Assistance/Compliance Reminders

##### **Certification and Benefit Issuance**

288 eligibility determinations were reviewed, 1 error was identified. Great job!

##### Zero Income

Effective in SY 2016-2017, any income field left blank is a positive indication of no income and certifies that there is no income to report. When no income is provided for any household members, the application may still be processed as complete.

##### Application Forms

Thank you for using the DPI prototype letters with the current non-discrimination statement.

##### Transferring Students

When a child transfers to a new school from *an outside agency*, the accepting school must obtain a copy of the source document (i.e. free and reduced application or Direct Certification file). A copy of the approval letter alone is not sufficient.

##### Independent Review of Applications

- LEAs that have a 5% or higher error rate during the certification review of the Administrative Review are required to conduct a second review of applications in the following school year.
- Abbotsford School District had a 0.003% certification error rate from SFA-1 and will not be required to conduct a second review of applications in the following school year.

##### Disclosure

- The information provided by families on the free and reduced price application is to be used only for determining eligibility for meal or milk benefits. The LEA must seek written consent from the parent or guardian to use the information provided on the application or through direct

certification for non-program purposes, such as athletic or testing fee waivers and backpack programs. Consent must be obtained each school year. A template sharing information form is located on the SNT webpage <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/sharing-info-other-programs-1617.doc>.

- For anyone receiving eligibility information to approve students for non-food service program benefits after parental consent is received, the *Disclosure Agreement* form should be signed and on file at the district. A template disclosure form is located on the SNT website <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/disclosure-agreement.docx>.

### **Meal Counting and Claiming**

- When entering the claim, the agency should be reporting 3 school sites operating NSLP and SBP-SN, not two. Abbotsford Alternative School is listed as a separate site on Schedule A of the online contract. No other errors found within the counting and claiming system. Great job!
- Reviewer noted the district has an 80% NSLP participation rate! High participation is a result of a well-run program, dedicated staff and student acceptance of menu items.

### **Findings and Corrective Action Needed**

#### **Certification and Benefit Issuance**

- ☐ **Finding #1:** Student #274 was incorrectly issued reduced meal benefits. The DO obtained a copy of the approval letter from a neighboring agency.

**Corrective Action Needed:** Obtain the source documentation (copy of the actual application) from the outside district and record the date on the SFA-1 as the date of correction. **Completed 1/24/17 onsite. No further corrective action required.**

#### **Verification**

- ☐ **Finding #1:** The agency reported 2 sites on the Verification Collection Report (VCR). There are 3 sites within the agency.

**Corrective Action Needed:** Update the VCR to report 3 sites. **Completed onsite. No further action required.**

- ☐ **Finding #2:** The households were not provided with 10 calendar days to appeal prior to implementing a decrease in benefits. All currently certified households for whom benefits are to be reduced or terminated must be given a full 10 calendar days' written advance notice of the change prior going into effect. The first day of the advance notice period is the day the notice is sent.

**Corrective Action Needed:** By signing this report, the agency agrees to provide 10 calendar days written notice for any adverse actions.

#### **Meal Counting and Claiming**

- ☐ **Finding #1:** The severe need numbers report on the 2016-17 SY online contract do not match the numbers audited.

**Corrective Action Needed:** Update the online contract to match the actual site-based free and reduced lunches claimed in the 2014-15 SY. Send the review consultant an email when you receive approval from the consultant assigned to your contract.

## 2. MEAL PATTERN AND NUTRITIONAL QUALITY

### Commendations

Thank you to the food service director at Abbotsford School District for planning interesting, nutritious meals for the students. A wonderful variety of fresh fruits and vegetable are offered every day. Thank you to all the food service staff for your hard work and for serving meals with a smile. The serving area is pleasantly decorated and the serving line is very appealing!

### Comments/Technical Assistance/Compliance Reminders

- **Meal Pattern:** Remember that there is no overlap in lunch meal pattern requirements for grades 6-12. Though the same menu may be served to all grades, there needs to be some differentiation in serving sizes or food items offered to meet the 6-8 and 9-12 meal patterns (and specifically the dietary specifications) separately. You can find details on the meal pattern requirements here: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/lunch-mpt.pdf>.
- **Vegetable Subgroups:** Some vegetables included on the garden bar production record were written under incorrect subgroups. The following vegetables all fall into the “other” vegetable subgroup: celery, cucumber, green pepper, pea pods, cauliflower, onion, kohlrabi, and radishes.
- **Offer versus Serve:** At breakfast, students must take 3 items, including ½ cup of fruit and/or vegetable, to have a reimbursable meal. This is different than at lunch, where OVS is determined by components (grains, meat/meat alternates, fruit, vegetable, milk). At breakfast, a student could have Craisins (½ cup fruit), banana (½ cup fruit), and ½ cup juice (which credits as fruit), and this would be considered a reimbursable meal.
- **Production Records:** Make sure to double check that your production records meet all of the requirements as listed on the handout at the top of our production record webpage: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/menu-planning/production-records>. Most of the critical information is filled out daily on production records, but some things, like temperatures, could be filled in more consistently. Make sure to always record the number of planned meals and actual meals served at the top of the production records. We discussed some ways to streamline your production records, and you may want to consider using different templates, which can be found on our production record webpage.

### Findings and Corrective Action Needed

❑ **Finding #1:** The bowl packs of Kix cereal served at breakfast weigh less than 1 ounce, and therefore credit as less than 1 ounce equivalent. Grains that credit as less than 1 ounce equivalent do not count as item at breakfast. This was discussed with staff before breakfast service.

**Corrective Action Needed:** Please submit a written statement confirming that you will no longer order or serve any cereal that weighs less than 1 ounce.

❑ **Finding #2:** During the week of review, the cinnamon twist served at breakfast was not whole grain-rich. A simple way to tell if a product is whole grain-rich is to look at the first ingredient, which should generally include the word “whole,” such as “whole wheat flour,” “whole corn,” or “whole oats.”

**Corrective Action Needed:** Please submit the nutrition facts label and ingredient list for:

- Cinnamon Twist – **Information for a new cinnamon roll product was submitted before the on-site review; no further action needed.**

### **3. RESOURCE MANAGEMENT**

#### **Commendations**

Thank you for completing the Paid Lunch Equity tool each year and adhering to the pricing requirements. The SFA may wish to consider applying for a PLE exemption for the 2017-18 SY. Increasing the paid student prices will further increase the excess cash balance. The tool and exemption form can be found on the PLE website: <https://dpi.wi.gov/school-nutrition/national-school-lunch-program/financial>

#### **Comments/Technical Assistance/Compliance Reminders**

##### **Nonprofit School Food Service Account**

Per the DPI 2015-16 SY audited report, the districts fund balance (without commodities) is \$172,625.88 and total expenditures were \$527,667.48. This results in a 3 month operating balance of \$175,889.16 and \$3,263.28 in excess cash. These figures are different than what was reported on the 2015-16 SY Food Service Annual Financial Report (AFR) as this report was not submitted accurately. Abbotsford School District will need decrease the excess cash to remain in compliance with a nonprofit status. If the funds are not spent, the district will be required to submit a spend down next school year. This plan may include the need to save for future projects requiring the carryover of funds. Suggestions for other ways to spend down this balance were discussed onsite.

##### **Annual Financial Report:**

- All revenues including reimbursements and student payments, and expenses including food, labor, equipment, purchased services, and other need to be entered into the program to which they belong. This will also aid the school in calculating its “yearly” reference period for nonprogram food compliance which is highly recommended. The new 16-17 Annual Financial Report instructions are located on our website at: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/annual-financial-report-instructions-new-1617.doc>
- The ending balance on June 30 from the previous year must be the beginning balance on July 1 for the current year.

##### **Allowable Costs**

- The nonprofit school food service account is to be used for the operation of the school meal program including food, supplies, equipment and personnel.
- The nonprofit school food service account may not be used to purchase land and/or buildings unless approved by FNS.
- USDA Policy Memorandum SP 46-2016 requires all SFAs operating federal school meal programs, by July 1, 2017, to have a written and clearly communicated policy that addresses unpaid meal charges. For a snap-shot on what the policy must include, see the Unpaid Meal Charges In a “Nutshell”: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/unpaid-meal-charges-nutshell.pdf>. For a more comprehensive overview, see SP 58-2016: Unpaid Meal Charges Guidance: <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-58-2016.pdf>
  - Best Practices
  - Local meal charge policy checklist
  - Sample outstanding balance letter

- Sample robo-call script
- Bad debt is an unallowable expense to the food service program. A transfer must be made from non-federal funds to cover student account write-offs. SP57-2016 Unpaid Meal Charges guidance Q & A may be found at <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-57-2016.pdf>.

### Revenue from Nonprogram Foods

- Nonprogram foods include: Adult Meals, A la Carte, Extra Entrees, Extra Milk (for cold lunch or milk break), Vended Meals (meals sold to other agencies), Catered Meals, and Food Service operated Vending Machines.
- All nonprogram food costs including food, labor, equipment, purchased services, and other must be covered by revenues received from the sale of those foods. Nonprogram foods may not be supported by reimbursable meals or have a nonprogram foods loss absorbed by the food service account. Nonprogram foods may never run in the negative unless non-federal funds are transferred into the food service fund to cover the deficit.
- Agencies must clearly track and separate nonprogram food costs and revenues from program food costs and revenues.
- The *USDA Nonprogram Revenue Tool* must be completed annually: [https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr\\_tool.xls](https://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/npr_tool.xls). An alternative is to use the *DPI Nonprogram Food Revenue Tool/Calculator*, which feeds into the USDA tool and aids in calculating prices of nonprogram foods and meeting the regulation. <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/xls/non-program-food-price-calculator.xlsx>
- Compare the reference period revenue ratio to the food cost ratio to determine if the revenue ratio is equal to or greater than the food cost ratio. If the revenue ratio is equal to or greater than the food cost ratio, the SFA is in compliance

$$\frac{\text{Nonprogram food revenue}}{\text{Total program and nonprogram revenue}} \geq \frac{\text{Total nonprogram food costs}}{\text{Total program and nonprogram food costs}}$$

### Adult Meals

Adult meals are considered non-program foods. Food service programs must price adult meals above the overall cost of the meals. Since adult meal costs can be difficult to calculate, SFAs must, at a minimum, follow the **minimum** pricing guidelines in Food Nutrition Services Instruction 782-5. A *Wisconsin Adult Meal Pricing Worksheet* has been developed to assist you in pricing adult meals <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/doc/wisconsin-adult-meal-pricing-guide.doc>. Districts need to reassess adult meal prices annually prior to contract submission to ensure student reimbursement are not being used to subsidize adult meals. The current reimbursement rates (2016-17 SY) should be used to determine 2017-18 SY prices because rates are not released until July 1 of each year.

#### Resources:

- Nonprogram Foods Revenue Rule SP-20-2016 <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/sp-20-2016.pdf>
- Nonprogram Foods in a Nutshell <http://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/nonprogram-foods-in-a-nutshell.pdf>.

#### **Findings and Corrective Action Needed:**

##### **Risk Assessment for Resource Management**

- ☐ **Finding #1:** The 2015-16 SY Annual Financial Report does not match the DPI audited report for total revenues and expenditures (less commodities) and the beginning fund balance is incorrect.  
**Corrective Action Needed:** Update the Food Service Annual Financial Report to match DPI WUFAR accounts. Submit a scanned copy of the updated report via email to [Jacqueline.Jordee@dpi.wi.gov](mailto:Jacqueline.Jordee@dpi.wi.gov) and copy the review consultant. Any updates made after the end of December can no longer be made online.

##### **Comprehensive Review- Revenue form Nonprogram Foods**

- ☐ **Finding #1:** The nonprogram food revenue ratio tool was not completed correctly. Reviewer is unable to assess compliance.  
**Corrective Action Needed:** Update the tool to reflect all nonprogram and program food items *sold during the 5 day reference period selected*. Items missing that must be included: adult lunches, adult breakfasts, adult snacks, and extra milks sales.

The program food cost and revenue (bottom portion of the tool must also be completed (raw food cost per meal, actual selling price + reimbursement, and the number sold during the 5 days). You should be able to obtain this data through the Skyward transaction reports for the large majority. If you have questions when completing the tool, contact the review consultant.

- ☐ **Finding #2:** Catering invoices and ala carte transaction summary reports were not provided to support sales are being tracked and revenues are making their way to the food service account.  
**Corrective Action Needed:**
- Submit 1 *internal* catering invoice and 1 *external* catering invoice from the 2015-16 SY with coinciding WUFAR ledger entries that support the revenue was deposited to Fund 50.
  - Submit one month of Skyward transaction summary reports showing the total value of adults meals and a la carte sales along with a ledger entry from WUFAR showing revenue from these sales made it to the food service account.

- ☐ **Finding #3:** The adult snack price is not set high enough to cover the per snack student free reimbursement.  
**Corrective Action Needed:** Raise the adult snack price to above \$0.84 at a minimum. Make sure this charge is implemented internally. **The contract was updated to \$1.00. No further action necessary.**



## 4. GENERAL PROGRAM COMPLIANCE

### Comments/Technical Assistance/Compliance Reminders:

#### Civil Rights

##### Special Dietary Needs

##### Medical Statement

- DPI has updated the prototype Medical Form posted on our website that you may use <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/medical-statement.pdf>. When the form is completed and signed by a licensed medical practitioner, the school is required to provide a meal that meets the child's needs as documented. The meal would *not* have to meet the meal pattern requirements, as the diet requests serves as the meal pattern for that particular child.
- Schools are not required to accommodate requests that are not supported by a signed statement from a licensed medical practitioner. Schools may accommodate non-disability requests if they choose to *as long as accommodations are made within the meal pattern requirements*. SFAs must ensure that accommodations are provided to all students equally. For more information on this topic, see the recently posted Wisconsin Q&A: <https://dpi.wi.gov/sites/default/files/imce/school-nutrition/pdf/q-and-a-sp-59-2016.pdf>

##### Processes for complaints

- Schools must have a process for receiving and processing complaints alleging discrimination within the school meals program.
- All verbal or written civil rights complaints regarding the school nutrition programs that are filed with the district must be forwarded to the Civil Rights Division of USDA Food and Nutrition Service within 3 days. You will want to make sure that this is included in the district procedures to ensure compliance.
- A SFA may always attempt to resolve a situation that is occurring in real time. However, if an individual states that they wish to file a civil rights complaint, the SFA must provide them with the information necessary to do so and not impede an individual's right to file. The form to assist in filing these complaints can be found on the DPI SNT website at [https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain\\_combined\\_6\\_8\\_12.pdf](https://www.ocio.usda.gov/sites/default/files/docs/2012/Complain_combined_6_8_12.pdf)

#### On-site Monitoring

- Every school year, each SFA with more than one school must perform no less than one on-site review of the meal counting and claiming system and the readily observable general areas of review identified under 7 CFR 210.18(h) in each school operating the NSLP and 50% of schools operating the SBP administered by the SFA by February 1.

The Administrative Review Final Rule updated 7 CFR Part 220.11(d)(1) establishing the requirement to conduct onsite monitoring of the School Breakfast Program beginning in school year 2016-17. The annual requirement is to annually review 50% of schools approved to participate in the SBP within the jurisdiction of the SFA, with each school in SBP being reviewed once every two years. For more information see USDA memo SP 56-2016

<http://www.fns.usda.gov/sites/default/files/cn/SP56-2016os.pdf>.



The onsite monitoring forms have been updated to include the general areas of review and a new SBP program onsite review form found on our website at: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/administrative-review> under the SFA onsite monitoring section.

## **Local Wellness Policy**

The local wellness policy requirement was established by the Child Nutrition and Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) Reauthorization Act of 2004 and further strengthened by the Healthy, Hunger-Free Kids Act of 2010 (HHFKA). The final rule requires School Food Authorities (SFAs) to begin developing a revised local school wellness policy during School Year 2016-2017 and full compliance with the requirements of the final rule by June 30, 2017.

At a minimum, SFAs must permit participation by the general public and the school community including parents, students, and representatives of the school food authority, teachers of physical education, school health professionals, the school board, and school administrators in the wellness policy process. In addition, SFAs must designate one or more school officials to ensure each school complies with the policy.

### Content of the Wellness Policy

At a minimum the wellness policy must include:

- Specific goals for nutrition promotion and education, physical activity, and other school-based activities that promote student wellness. LEAs are required to review and consider evidence-based strategies in determining these goals.
- Standards and nutrition guidelines for all foods and beverages sold to students on the school campus during the school day that are consistent with Federal regulations for school meal nutrition standards, and the Smart Snacks in School nutrition standards.
- Standards for all foods and beverages provided, but not sold, to students during the school day.
- Policies for food and beverage marketing that allow marketing and advertising of only those foods and beverages that meet the Smart Snacks in School nutrition standards.
- Description of public involvement, public updates, policy leadership, and evaluation plan.

SFAs must complete an assessment of the policy every three years to determine compliance with the wellness policy, how the wellness policy compares to model policies, and process made in attaining the goals of the wellness policy. SFAs must make the Triennial Assessment available to the public. In addition, SFAs must make available to the public the wellness policy and any updates to the wellness policy on an annual basis.

- Specific areas that are missing from the district's current policy are: Direct mention of policy leadership, Smart Snacks (governs food sold to students on campus during the school day); food and beverage marketing; and nutrition promotion using evidence based strategies. The first triennial Assessment is due in 2020.

A summary of the requirements can be found at:

[https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary\\_finalrule.pdf](https://healthymeals.nal.usda.gov/sites/healthymeals.nal.usda.gov/files/uploads/LWPsummary_finalrule.pdf). USDA Food and Nutrition Service has information on the local school wellness policy

process and wellness policy elements at: <https://healthymeals.nal.usda.gov/school-wellness-resources>. Wisconsin Team Nutrition has several wellness policy resources available including a toolkit, a wellness policy builder, and wellness policy report card at: <http://dpi.wi.gov/school-nutrition/wellness-policy>.

## **Smart Snacks in Schools**

### Comments/Technical Assistance/Compliance Reminders

- Abbotsford Middle/High School has a vending machine selling fat-free chocolate milk in 12 fluid ounce bottles, and has had two exempt fundraisers this school year. Each of these situations is in compliance with the Smart Snacks guidelines.
- For any upcoming exempt fundraisers, remember that they can be no longer than two consecutive weeks in length and cannot occur in the meal service areas during meal time. Make sure that exempt fundraisers are tracked in a central location to ensure that the guidelines are met.
- Please see our Smart Snacks webpage for more information on the rule, including our “Smart Snacks In a Nutshell” handout, a link to the product calculator, and fundraiser tracking tool templates: <http://dpi.wi.gov/school-nutrition/national-school-lunch-program/smart-snacks>.

## **Professional Standards**

- The Professional Standards regulations in 7 CFR 210.30 established hiring standards for new school nutrition program directors, hired on or after July 1, 2015, that manage and operate the National School Lunch and School Breakfast Programs. Abbotsford’s director has been grandfathered in and is in compliance.
- In addition, the regulations established annual training standards for all school nutrition program directors, managers, and staff which must be tracked. Annual training must be job-specific and intended to help employees perform their duties well. The required annual training hours vary according to the employee’s role in the management and operation of the school nutrition program.
- Training obtained since April 1, 2015 may count towards training requirements. Trainings can be provided in a variety of formats (online, in person, webinars) and through various providers (DPI, USDA, in-house, etc.).
- SFAs should clearly document all required training information and maintain that file including the name of staff person, date hired, title/position, brief list of core duties/responsibilities, status (full, part-time, volunteer, etc.), professional standards position (director, manager or staff). Learning codes are not required, but encouraged. A template tracking tool is posted to our website at <http://dpi.wi.gov/school-nutrition/training/professional-standards>.

## **Food Safety, Storage and Buy American**

### Temperatures

As a reminder, internal temperatures must be taken and recorded *daily* on temperature logs. Upon reviewing the production records, reviewer noted gaps in historical records for a couple of menu items.

### Food Safety Plans

The Food Safety Plan was available, but has not been internally reviewed recently. As a reminder an annual review should be documented and updates made as needed.

### Storage

SFAs are required to ensure that facilities for the handling, storage, and distribution of purchased and donated foods are properly safeguarded against theft, spoilage, and other loss (7 CFR 210.13(d)).

The on-site storage areas were reviewed, including freezers, refrigerators, dry good storage rooms and other areas. It was noted that boxes are being stored on the floor of the freezer. Review the site's food safety plan SOP#10, which states food items will be kept on shelves that are at least 6" above the floor to facilitate air circulation and proper cleaning.

### Time as Public Health Control

- When using "Time as a Public Health (Temperature) Control", the Food Safety Plan should contain an SOP specific to this topic if the practice is being utilized. This SOP no longer needs the pre-approval of the local sanitarian, simply keep it in your food safety plan.
  - The internal temperature must be at or below 41 degrees F. at the beginning of this holding period for cold potentially hazardous foods.
  - Up to 6 hours at an internal temperature of 41-70 degrees F. under monitored conditions for cold potentially hazardous foods. Provisions must be made to discard product if the 6 hour time limit is exceeded, the temperature of the cold potentially hazardous food rises above 70 degrees F., or the food is removed from service.
  - The maximum time is 4 hours for heated potentially hazardous foods. Provisions must be made to discard product if the 4 hour time limit is exceeded, the temperature of the heated potentially hazardous food falls to 70 degrees F., or the food is removed from service.
  - **There can be no leftovers and no reuse of the items covered under this plan.** Thus, if any Temperature Control for Safety (TCS) food is held outside of mechanical refrigeration during service, including TCS foods on garden bars, all left over TCS foods must be discarded.

### **Buy American**

The USDA requires that a SFA purchase, to the maximum extent practicable, domestic commodities or products. Using food products from local sources supports small local farmers and provides healthy choices for children in the school meal programs. Purchasing from these entities also supports the local economy. The Buy American provision is required whether food products are purchased by SFAs or entities that are purchasing on their behalf.

The Buy American provision should be included in solicitations, contracts, and product specifications. A reply offer to comply with Buy American terms in a solicitation ensures contractors are aware of Buy American requirements. Further, bidder assurance of the Buy American provision ensures that the bidder is responsive and responsible to the solicitation.

There are limited exceptions to the Buy American provision which allow for the purchase of products not meeting the "domestic" standard as described above ("non-domestic") in circumstances when use of domestic products is truly not practicable. Refer to SP 24-2016 for more information on the Buy American provision and limited exceptions.

More information on this new requirement can be found on the SNT website at <http://dpi.wi.gov/school-nutrition/procurement/buy-american> including a tool to assist with tracking noncompliance products.

A few noncompliant items were identified in storage areas. These should be followed up on and sourced domestically or documented as noncompliant (under an exemption) once exhausted: garlic powder (China), canned pineapple (Philippines), and sugar snap peas (Mexico). Remind your vendors of the Buy American Provision and work with them to source domestic alternatives.

### **SBP and SFSP Outreach**

At the beginning of the school year, the SFA must notify families of the availability of breakfast and schools should send reminders regarding the availability of the SBP multiple times throughout the school year.

### **Breakfast Promotion**

The breakfast participation is low compared to participation at lunch. Therefore, it is suggested that ideas for increasing participation be considered. One idea would be to look at offering breakfast in the classroom or a mid-morning breakfast model (either out of the kitchen or in the classroom). More information about potential breakfast service models as well as financial models can be found in the Serving up a Successful School Breakfast Program guide: <http://dpi.wi.gov/school-nutrition/school-breakfast-program>.

A Breakfast in the Classroom Toolkit is also available if that option is considered:

[http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC\\_Final-web.pdf](http://fyi.uwex.edu/wischoolbreakfast/files/2009/10/BIC_Final-web.pdf)

Parents play an important role in School Breakfast Program participation. A video was developed to help show parents the benefits that the School Breakfast Program provides for them and their children. This video along with a brochure can be found on our website:

<https://www.youtube.com/watch?v=aHR7eECbKaE>

National School Breakfast Week is in the spring each year. This is a great time to promote your breakfast program, try new recipes, incorporate activities, etc. to increase participation.

- School Breakfast is promoted in the Back-to-School newsletter, monthly menus and throughout the year in the newsletter.
- Continue to promote participation in the School Breakfast Program with fun menus or promotions.

### **Summer Meals**

A goal of USDA Child Nutrition Programs is to ensure all students have access to healthy and nutritious meals year round. USDA would like all SFAs to inform families of where their students can receive a free meal in the summer months. SFAs can inform families of summer meals via the following methods:

- Promotion of the [summer meals locator](#) on the [DPI Summer Meals website](#)
- Promotion of calling 211 to locate meals in the area
- Promotion of the ability to text ‘food’ to 877-877 to locate meals in the area
- Promotion of the USDA Summer Food website  
<http://www.fns.usda.gov/summerfoodrocks>.

For more information on Summer Feeding option contact:

Amy J. Kolano, RD, CD

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- ☐ **Finding #1:** Professional Standards hours are not being tracked as required. Staff have conducted/attended many internal trainings and DPI school nutrition trainings, but these records were not accessible/supported through a central tracking mechanism.

**Corrective Action Needed:** Submit a completed tracking tool for all nutrition program staff summarizing completed trainings from April 1, 2015 to current. Tracker tools must contain name, hire date, category, Key Areas, Key Topics, training hours and date.

## **5. OTHER FEDERAL PROGRAMS REVIEWS**

### **Comments/Technical Assistance/Compliance Reminders:**

#### **Afterschool Snacks**

- Abbotsford School district operates Area Eligible Afterschool Snacks sites, which means all snacks are claimed at the free rate. Questions on the onsite monitoring form related to non-area eligible sites (F, R, and P) claiming categories do not need to be completed unless the school no longer qualifies as an area eligible site.
- As a reminder, the entire Afterschool snack onsite monitoring form should be completed to ensure compliance in all required areas. Reviewer noted that areas were not completed on the form that are integral parts of the program (e.g., enrichment activities, attendance, and water availability). If these components are missing, corrective action must be taken. Upon observing service, there are enrichment activities, attendance counts, and water is made available.
- Attendance is being taken during snacks service but this data is not being used to report ADA on the monthly claim form. As a reminder, the average daily attendance reported on the monthly ASP claim for must be specific to that program. It would not be allowable to use the ADA of the NSLP.

#### **Fresh Fruit and Vegetable Program**

##### **Commendations**

Thank you for offering FFVP to your elementary school students, as the program is a wonderful way to expose young children to a variety of fresh fruits and vegetables that they might otherwise not have a chance to taste.

##### **Comments/Technical Assistance/Compliance Reminders**

As a reminder, actual labor hours must be recorded each month and used to complete your monthly claims. During the month for which the claim was validated, a timesheet was completed with everything except for actual labor hours. However, labor hours have been recorded on all subsequent months' timesheets.

##### **Findings and Corrective Action Needed**

- ☐ **Finding #1:** Abbotsford's September 2016 FFVP claim was validated by comparing the claim with invoices. Three cases of apples were claimed while only two cases were actually ordered and used for the program. Therefore, a total **overclaim of \$30.85** will be reported as fiscal action and subject to the NSLP \$600 disregard as part of Abbotsford School District's Administrative Review.

**Corrective Action Needed:** Please provide a written statement explaining how this type of error will be avoided in the future.

**Finding #2:** The WSDMP contract for the district is outdated. DPI would like to begin updating these records.

**Corrective Action:** Submit an updated WSDMP contract to the review consultant for approval. A copy of the contract template can be found here:

<http://dpi.wi.gov/sites/default/files/imce/forms/doc/pod1464.doc>

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Dr. Tony Evers, State Superintendent of Wisconsin Department of Public Instruction, shares a vision that every student will graduate prepared for college and career in an initiative called “Agenda 2017”. His goals are for students to have the knowledge, skills, and habits that will allow them to succeed in life after high school. Access to quality nutrition plays a major role in developing those life-long habits.

The School Nutrition Team believes that what school nutrition programs do every day plays a very important part in the success of every child being able to graduate. We all know that well-nourished children are ready to learn. Thank you for all you do to ensure your students’ success.

For more information on this initiative, please visit the Wisconsin DPI Every Child a Graduate webpage [dpi.wi.gov/statesupt/agenda-2017](http://dpi.wi.gov/statesupt/agenda-2017).

